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DAVE MARTIN
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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 23, 2012

Jose Franco, Manager
Carlsbad Field Office
Department of Energy
P.O. Box 3090
Carlsbad, New Mexico 88221-3100

M. Farok Sharif, President
Washington TRU Solutions LLC
P.O. Box 2078
Carlsbad, New Mexico 88221-5608

RE: NMED APPROVAL OF FINAL AUDIT REPORT, SAVANNAH RIVER SITE/CENTRAL CHARACTERIZATION PROJECT, AUDIT A-12-02 WASTE ISOLATION PILOT PLANT EPA I.D. NUMBER NM4890139088

Dear Messrs. Franco and Sharif:

On April 26, 2012, the New Mexico Environment Department (NMED) received the Final Audit Report of the Savannah River Site/Central Characterization Project (SRS/CCP) Audit Number A-12-02 (Audit Report), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Washington TRU Solutions LLC (the Permittees) were required to submit this Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Section 2.3.2.3. The intended scope of this recertification audit was to ensure the continued adequacy, implementation, and effectiveness of the SRS/CCP waste characterization processes for retrievably stored contact handled (CH) Summary Category Group (SCG) S3000 homogeneous solid, S4000 soils/gravel, and S5000 debris wastes, relative to the requirements of the WIPP Permit.

The Audit Report consisted of the following items:

- A narrative report (hardcopy and electronic)
- Copies of relevant Permit Attachment C6 checklists (hardcopy and electronic)
- Final SRS/CCP standard operating procedures for characterization of the waste categories listed above (hardcopy and electronic)



- CBFO CAR 12-002 Closure Package
- Objective evidence examined during the audit:
 - General information
 - Acceptable knowledge
 - Headspace gas sampling
 - Solids sampling and analysis
 - Real-time radiography
 - Visual examination

NMED representatives observed the audit on November 14-17, 2011. NMED has examined the Audit Report for evidence of compliance with the requirements of Permit Sections 2.3.2 (Audit and Surveillance Program) and 2.3.1 (Waste Analysis Plan [WAP]). The Audit Report indicates there was one Condition Adverse to Quality resulting in the issuance of a Corrective Action Report (CAR), one observation (conditions that, if not controlled, could result in conditions adverse to quality), and one recommendation for consideration.

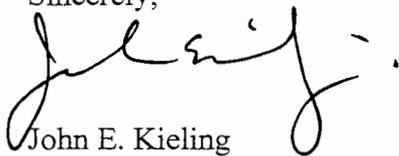
- CAR 12-002: The Site Project Manager oversees Transuranic waste (TRU) characterization and certification activities per CCP procedure CCP-PO-001, Rev. 20, Section C3-10b states, "Data validation and verification (V&V) at this level [*Project Level*] involves scrutiny and signature release from the SPM." The following issues were identified by the audit team during the evaluation of project-level data V&V: 1.) Waste Stream Profile Form numbers were incorrect on several CCP Date Evaluation Narratives, 2.) In Attachment 4 of the CCP SPM Nondestructive Assay Project Level Validation Checklist and Summary, question 10 did not indicate the correct information under the Criteria Met column and Comments/Qualifiers section, and 3.) The Independent Technical Reviewer checklist for real-time radiography did not contain complete procedure and revision information on Attachment 3, Item 2, in the batch data report SRLBR0008.
- Observation: Several inconsistencies were found in the Acceptable Knowledge (AK) documentation describing the AK documentation type on Attachment 3, AK Source Document Summary, and Attachment 11, AK Source Document Discrepancy Resolution Form. If the inconsistencies are not properly addressed, the issue may result in a condition adverse to quality.
- Recommendation: The audit team recommends that SRS/CCP revise the affected AK documentation to ensure compliance with the December 2010 WAP requirements. NMED WAP Compliance Tracking Tables completed by the CCP acceptable knowledge experts were reviewed for a CH TRU mixed waste stream that was examined during the AK portion of this recertification audit. Appropriate and agreed-upon changes were made to the forms, and freeze files will be attached to the AK Summary as part of the record submitted to NMED in keeping with the agreement entered into the first audit after the new WAP went into effect.

NMED concludes that this Audit Report demonstrates that SRS/CCP has implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for SRS/CCP Audit A-12-02 for continued certification of retrievably stored S3000 homogeneous solid, S4000 soils/gravel, and S5000 debris CH wastes, and amends the previous Audit Report for A-11-01 issued by NMED on March 3, 2011 to include only those waste forms and processes evaluated by this recertification audit.

This Audit Report approval is of the broad programmatic implementation of waste characterization requirements at SRS/CCP, and does not constitute approval of individual waste characterization procedures, nor condone inappropriate applications of those procedures. This approval does not relieve the Permittees of their obligation to comply with the requirements of the permit or other applicable laws and regulations.

If you have any questions regarding this matter, please contact Trais Kliphuis at (505) 476-6051.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

JEK: tlk

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